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*Attorneys for Certain Term Loan Lender Defendants
identified on Exhibit 1 to Dkt. No. 788*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11 Case
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (MG)
	:	
Debtors.	:	(Jointly Administered)
	:	
MOTORS LIQUIDATION COMPANY AVOIDANCE	:	Adversary Proceeding
ACTION TRUST, by and through the Wilmington Trust	:	
Company, solely in its capacity as Trust Administrator and	:	Case No. 09-00504 (MG)
Trustee,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JPMORGAN CHASE BANK, N.A., individually and as	:	
Administrative Agent for various lenders party to the Term	:	
Loan Agreement described herein, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	

**JOINDER IN OPPOSITION TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT
DISMISSING THE NON-JPMORGAN TERM
LENDERS' EFFECTIVENESS DEFENSE**

Certain Term Loan Lenders (collectively, “**the Defendants**”) by their undersigned counsel, hereby join the Term Loan Lenders in opposing Plaintiff’s Motion for Partial Summary Judgment Dismissing the Non-JPMorgan Term Lenders’ Effectiveness Defense, filed on September 14, 2018 [Dkt. No. 1085], for the reasons set forth in the Term Loan Lenders’ Response to Plaintiff’s Motion for Summary Judgment, filed on October 12, 2018 [Dkt. No. 1097].

WHEREFORE, the Defendants respectfully request that the Court deny the Plaintiff’s Motion for Partial Summary Judgment Dismissing the Non-JPMorgan Term Lenders’ Effectiveness Defense and grant the Defendants such other and further relief as it deems just and proper.

Dated: New York, New York
October 15, 2018

Respectfully submitted,

By: /s/ Elliot Moskowitz
Elliot Moskowitz
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788*